

Sage Legal LLC

18211 Jamaica Avenue • Jamaica, NY 11423-2327 • (718) 412-2421 • emanuel@sagelegal.nyc

August 19, 2024

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Peggy Kuo, U.S.M.J.
225 Cadman Plaza East
Courtroom 11C South
Brooklyn, NY 11201-1804

Re: Aragon v. Brahspati, Inc., et al.
Case No.: 1:22-cv-6342 (EK) (PK)

Dear Judge Kuo:

This firm represents the Defendants in the above-referenced case, who write to respectfully provide a status report and request an extension of time to submit a revised settlement agreement.

On Saturday, August 17, 2024, Defendants submitted to Plaintiff a further revised settlement agreement and executed counterpart. Your undersigned understands that, prior thereto, Plaintiff had previously executed a prior draft of a revised settlement agreement. Thus, Defendants believe – but cannot confirm – that Plaintiff’s counsel has not yet had an opportunity to review Defendants’ revisions with his client, and thus additional time is necessary to submit a fully executed revised settlement agreement.

Pursuant to ¶ IV(B) of this Court’s Individual Practice Rules, Defendants respectfully submit that:

- (i) the deadline to submit a revised settlement agreement is today, August 19, 2024;
- (ii) the reason for the request is set forth above;
- (iii) there have been several previous requests for an extension of this deadline, all of which were granted (some *sua sponte* without a request, with gratitude from your undersigned and apologies);
- (iv) it is unknown whether, but highly likely that, Plaintiff consents to this request; and
- (v) the requested extension should not affect any other scheduled dates or deadlines.

Based on the foregoing, Defendants respectfully submit that there exists both good cause and excusable neglect such that this Court should exercise its discretion in favor of granting the requested extension of time.

Defendants thank this honorable Court for its time and attention to this case.

Dated: Jamaica, New York
August 19, 2024

Respectfully submitted,

SAGE LEGAL LLC

/s/ Emanuel Kataev, Esq.
Emanuel Kataev, Esq.
18211 Jamaica Avenue
Jamaica, NY 11423-2327
(718) 412-2421 (office)
(917) 807-7819 (cellular)
(718) 489-4155 (facsimile)
emanuel@sagelegal.nyc

Attorneys for Defendants

VIA ECF
all counsel of record